

**UNITED STATES DISTRICT COURT**  
for the  
District of New Mexico



United States of America  
v.

Adam Mann  
a.k.a. "Adam Lopes"  
a.k.a. "Pacman"

Case No. 22-MJ-1108

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 4, 2022 in the county of Bernalillo in the  
District of New Mexico, the defendant(s) violated:

*Code Section*

18 U.S.C. §§ 922(g)(1) and 924

*Offense Description*

Possession of a firearm and ammunition by a convicted felon

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

  
*Complainant's signature*

Jordan Spaeth, FBI Special Agent

*Printed name and title*

Sworn telephonically and signed electronically

Date: 7/5/22

City and state: Albuquerque, New Mexico



*Judge's signature*

Honorable Steven C. Yarbrough

*Printed name and title*

AFFIDAVIT IN SUPPORT OF ARREST WARRANT AND CRIMINAL COMPLAINT

I, Jordan Spaeth, being first duly sworn, hereby depose and state as follows:

**Introduction and Background of the Affiant**

1. I am a Special Agent with the FBI and have been a sworn law enforcement officer for over 13 years, serving as a police officer and FBI Special Agent. I have been with the FBI since 2018 and am currently assigned to the Albuquerque division of the FBI, to the Violent Gang Task Force (“VGTF”). As a member of the VGTF my primary responsibility is to investigate criminal enterprises involving violent repeat offenders and gang members who participate in narcotics violations, firearms violations, human trafficking, robberies, and other violations of federal law. Prior to my current assignment I was assigned to the Violent Crime Task Force and also worked violent felony crimes which were committed on the multiple Indian Reservations/Pueblos surrounding Albuquerque, New Mexico.

2. My investigative training and experience includes, but is not limited to, interviewing subjects, targets, and witnesses, writing affidavits for, and executing search and arrest warrants, collecting evidence, conducting surveillance, and analyzing public records. Over the course of my career, I have arrested hundreds of persons for offenses relating to armed robberies, firearm violations, bank robberies, illegal narcotics, and other criminal conduct. I have also been responsible for serving subpoenas and supervising cooperating sources, as well as analyzing phone records.

3. I make this affidavit in support of the arrest of ADAM **MANN**<sup>1</sup>, a.k.a. “ADAM LOPES, a.k.a. “PACMAN” (“**MANN**”), for a violation of 18 U.S.C. §§ 922(g)(1) and 924, that being possession of a firearm and ammunition by a convicted felon.

4. The statements contained in this affidavit are based upon my investigation, training

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<sup>1</sup> A Motor Vehicle Department photograph of MANN is attached hereto as attachment 1.

## AFFIDAVIT IN SUPPORT OF ARREST WARRANT AND CRIMINAL COMPLAINT

and experience, and information provided by other law enforcement officers or from other reliable sources. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause to support a criminal complaint against **MANN**.

### **Criminal History**

5. I have reviewed **MANN**'s criminal history. I am aware he has been arrested eight (8) times in New Mexico. I am aware that **MANN** was convicted of the following felony offenses:

- a. Trafficking controlled substance, PWITD, convicted on May 4, 2009, in case D-202-CR-2007-01766; and
- b. Possession with intent to distribute 5 grams or more of crack cocaine, carrying a firearm during and in relation to a drug trafficking crime, and a person in possession of a firearm who is an unlawful user of or addicted to any controlled substance, convicted on November 1, 2007, in case 07-CR-385.

### **Probable Cause**

6. On May 31, 2022, WITNESS 1 (whose identity is known to me but not included herein for their safety) called 911 to report **MANN** was observed on security camera footage at his next-door neighbor's house, 3310 Shepard Place Northeast, kicking the door holding two handguns and demanding their vehicles<sup>2</sup>. WITNESS 1 further advised dispatch that **MANN**'s house, 3314 Shepard Place Northeast, and vehicle had bullet holes from a drive by shooting. Agents later observed bullet holes in the driver's side of **MANN**'s white GMC pickup truck.

7. On June 4, 2022, Albuquerque Fire Rescue (AFR) responded to **MANN**'s residence

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<sup>2</sup> A screenshot from the surveillance video is attached hereto as attachment 2.

## AFFIDAVIT IN SUPPORT OF ARREST WARRANT AND CRIMINAL COMPLAINT

in reference to a house fire. AFR Arson Investigators later responded and during the course of their investigation, they observed two handguns in the residence. An officer with the Albuquerque Police Department (APD) responded and seized the two handguns and ammunition from the residence for safekeeping. The two handguns and ammunition were tagged into APD evidence and may be described as:

- a. Glock 42 .380 caliber pistol, serial number ACWX683;
- b. Beretta 96A1 .40 caliber pistol, serial number A69157M;
- c. five (5) Winchester .380 auto rounds;
- d. eight (8) .40 S&W rounds; and
- e. one (1) Federal .40 S&W round.

8. Agents later learned that on June 13, 2022, **MANN** was out front of his house giving the middle finger to the neighbor's security cameras<sup>3</sup>. Shortly thereafter, officers with the APD made contact with **MANN** out front of his residence.

9. On June 20, 2022, agents reviewed electronic surveillance video which captured the June 4 house fire. Agents observed a male who appeared to be **MANN** leave his residence and walk away. **MANN** was the only person who was observed leaving the residence. Shortly thereafter, smoke was observed coming from **MANN**'s residence and AFR arrived. As AFR arrived, **MANN** left the area on foot.

### **Interstate Nexus**

10. On July 1, 2022, SA Spaeth examined the firearms and ammunition listed above. The firearms functioned as designed and the firearms and ammunition meet the federal definition of a firearm and ammunition pursuant to 18 U.S.C. § 921 Chapter 44. Based on my training,

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<sup>3</sup> A screenshot from the surveillance video is attached hereto as attachment 3.


AFFIDAVIT IN SUPPORT OF ARREST WARRANT AND CRIMINAL COMPLAINT

research, and experience I am aware that Glock, Beretta, Winchester, and Federal firearms and ammunition are not manufactured in the state of New Mexico and therefore traveled in interstate commerce before they possessed by **MANN**.

**Conclusion**

11. Based on the above information, I believe there is probable cause that **MANN** violated 18 U.S.C. §§ 922(g)(1) and 924. This affidavit has been reviewed and approved by Assistant United States Attorney Paul Mysliwec. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Respectfully submitted,

  
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Jordan Spaeth  
Special Agent  
Federal Bureau of Investigation

Sworn telephonically and signed electronically on July 5, 2022:



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HONORABLE STEVEN C. YARBROUGH  
UNITED STATES MAGISTRATE JUDGE  
ALBUQUERQUE, NEW MEXICO

AFFIDAVIT IN SUPPORT OF ARREST WARRANT AND CRIMINAL COMPLAINT

Attachment 1:



AFFIDAVIT IN SUPPORT OF ARREST WARRANT AND CRIMINAL COMPLAINT

Attachment 2:



AFFIDAVIT IN SUPPORT OF ARREST WARRANT AND CRIMINAL COMPLAINT

Attachment 3:

